

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:
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	:
-against-	:
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	:
SEPEHR SARSHAR,	:
	:
Defendant.	:
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1:21-cr-202-GHW

ORAL ARGUMENT REQUESTED

**DEFENDANT SEPEHR SARSHAR'S NOTICE OF MOTION TO
DISMISS THE INDICTMENT, COMPEL THE PRODUCTION OF A BILL OF
PARTICULARS, AND STRIKE SURPLUSAGE**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, as well as the Declaration of Avi Weitzman and the exhibits attached thereto, both dated July 1, 2021, Defendant Dr. Sepehr Sarshar, by and through his undersigned counsel, respectfully moves this Court before the Honorable Judge Gregory H. Woods, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007-1312, at such date and time as the Court may direct, for an Order: (1) dismissing the Indictment because it is duplicitous; (2) compelling the production of a bill of particulars; and (3) striking prejudicial surplusage from the Indictment under Rule 7(d) of the Federal Rules of Criminal Procedure, and granting such other and further relief to which the Court deems the defendant entitled.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: New York, New York
July 1, 2021

/s/ Avi Weitzman

Avi Weitzman

Reed Brodsky

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